

Exhibit 1

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of trademark Registration No. 1,101,013

For the mark VILLAGE PEOPLE

Date registered: August 29, 1978

KAREN L. WILLIS,

Petitioner,

V.

CAN'T STOP PRODUCTIONS, INC.,

Registrant.

Cancellation No. 92051215

DECLARATION OF HENRI BELOLO

Henri Belolo declares as follows:

1. I am the Managing Director of Can't Stop Productions Inc., ("Can't Stop") the owner of U.S. Trademark Registration No. 1,1010,013, the subject of the present cancellation proceedings (hereinafter "the '013 Registration"). I have been the Managing Director of Can't Stop since its formation in 1975, and am fully familiar with the facts and circumstances set forth herein.
2. In 1977 Can't Stop created and formed a unique musical group featuring performers in 6 costumes, each representing an iconic American character; an Indian, a cowboy, a biker, a construction worker, a military man, and a policeman. Can't Stop adopted the mark VILLAGE PEOPLE for use with this musical and vocal group. Both the mark VILLAGE PEOPLE and the costumes as applied to the entertainment services performed by the group are arbitrary, with respect to such entertainment services.

3. Since its inception, the Village People group performs high energy "club" or "disco" songs while dressed in these specific, distinctive costumes. Performances by the Village People group include both instrumental and vocal renditions of music.

4. The Village People group immediately achieved a high degree of success, and has gained worldwide fame in connection with musical performances and musical recordings. Among their many hit songs are "Y.M.C.A", "Macho Man", "In the Navy", and "Go West". Today, some 30 years after its inception, the Village People group continues to tour and maintain its status as a unique musical act. As a testament to the continued fame of the Village People, the Village People was awarded a star on the Hollywood Walk of Fame in September 2008.

5. Since the creation of the Village People in 1977 Can't Stop has always been the sole owner of all trademark rights related to the Village People, including the VILLAGE PEOPLE mark.

6. As owner of the trademark rights associated with the Village People group, from the inception of the group Can't Stop has been solely responsible for controlling the quality and nature of the goods and services offered under each of the Village People marks, including the VILLAGE PEOPLE mark.

7. Initially, Can't Stop hired individuals to perform in the Village People group. All of the performers signed contracts acknowledging Can't Stop's sole and exclusive rights to the trademarks associated with the Village People. Subsequently, Can't Stop licensed rights to use the Village People marks to Sixuvus Ltd., which currently remains Can't Stop's licensee.

8. Petitioner Karen Willis is the wife of Victor Willis, one of the original performers hired by Can't Stop Productions to perform in the Village People. When Can't Stop Productions, Inc. employed him, Mr. Willis signed an agreement expressly acknowledging

that Can't Stop owns all rights associated with the Village People group's marks. Attached as Exhibit A is a true copy of an Agreement of October 14, 1977 between Can't Stop and Mr. Willis. The agreement provided that Mr. Willis acknowledged ownership of the VILLAGE PEOPLE name and mark in Can't Stop, (Para. 3) and acknowledged Can't Stop's ownership of any rights or interests of every kind and character resulting from Mr. Willis's services to Can't Stop (Para. 6).

9. As the agreement evidences, Victor Willis has no rights and never had any rights in any trademark related to the Village People group.

10. Mr. Willis' services were first terminated by Can't Stop in 1979. Mr. Willis permanently ceased to be a member of the Village People in 1982 and has not had any further affiliation with Can't Stop for over twenty-five years. Mr. Willis has not performed under any of the marks associated with the Village People group owned by Can't Stop since 1982, and has no authorization to do so.

11. Can't Stop Productions, Inc. obtained a federal trademark Reg. No. 1,101,013 (the "'013 Registration") for the VILLAGE PEOPLE mark on August 29, 1978.

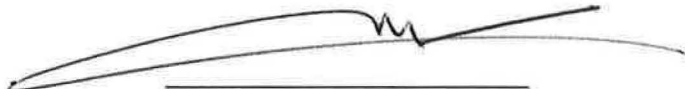
12. Can't Stop Productions, Inc. has used the VILLAGE PEOPLE mark continuously in connection with entertainment services since July 11, 1977. During the prosecution of the application which matured into the '013 Registration, Registrant submitted a specimen showing use of the mark. Attached as Exhibit B is a copy of the specimen in the application, which was in use prior to the filing date of the application.

13. Can't Stop Productions, Inc. has continuously owned and used, either itself or through Sixuvus Ltd., the VILLAGE PEOPLE mark since the departure of Victor Willis. No other entity is authorized or, to the best of Can't Stop's knowledge uses, the VILLAGE PEOPLE mark; it solely identifies Can't Stop as the source of the associated services.

14. Petitioner herself has acknowledged that Can't Stop is the owner of and has sole rights to the marks associated with the Village People group. In 2007 Ms. Willis sought a license from Can't Stop Productions to use the VILLAGE PEOPLE mark. Attached as Exhibit C is a true copy of a letter from Ms. Willis (then using her maiden name Huff) to Stephen L. Kopitko, attorney for Can't Stop, requesting a license to use the Village People marks.

15. Can't Stop refused to grant a license to Petitioner or Mr. Willis. Petitioner then threatened to harass Can't Stop and its licensee through lawsuits and other unfounded legal actions. Upon information and belief, the present cancellation proceeding is an element of Petitioner's carrying through on her promise. She has also filed petitions to cancel two other registrations owned by Can't Stop.

I declare under penalty of perjury that the foregoing is true and correct.



Henri Belolo

Executed: May ^{28th} 29, 2010